

REVISION HISTORY

| Revision # | Date | Approved by | Change |
|-------------------|-------------|--------------------|---------------------------------------------------------------------------|
| 0 | 11/14/01 | M. zu Hone | |
| 1 | 09/20/02 | M. zu Hone | Updates to reflect changes in SEOPs and process improvements (web page) |
| 2 | 03/12/03 | S. Fontana | Updates to reflect changes in SEOPs and continuous improvement in the EMS |
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INTRODUCTION

EMS Manual

This EMS-Manual provides an overview of the Refuse Disposal Division's (RDD) Environmental Management System (EMS) with references to more detailed supporting documentation. It is intended as a reference document for division personnel or other interested parties for general guidance and referral to more detailed information.

Background

In March of 2002, the Disposal Division of the City of San Diego's Environmental Services Department, along with thirteen other governmental entities, concluded participation in a 24 month long U.S. EPA sponsored "Initiative for Government Entities" pilot project. This project was designed to allow each participant to develop an Environmental Management System (EMS) and to be in position for certification to the ISO 14001 standard at the program's conclusion.

Key Drivers for Adopting an EMS

The Environmental Services Department identified several factors that led to their decision to design and implement an EMS. The Department hoped to improve employees' participation in environmental matters as well as improving the Department's overall environmental performance.

Due to its significant impact on the environment and heavy interface with the regulatory community, the Refuse Disposal Division was selected as the lead division for this project. The Division is made up of five major programs which include: Fee Collection, Miramar Landfill Operations, Post Closure Maintenance and Regulatory Compliance, Groundwater and Landfill Gas Management and Biological Services. The Division is responsible for the City's only active municipally owned landfill. The Miramar Landfill handles approximately 1.4 million tons of refuse annually and processes over 400,000 customer fee transactions per year

ISO 14001 Certified!

On July 31, 2002, the Refuse Disposal Division received official notification that the Refuse Disposal Division's Miramar Landfill had become the first municipally owned and operated landfill in the country to successfully complete the rigorous certification process and be registered to the ISO 14001 standard.

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LIST OF ACRONYMS

| | |
|-------|---------------------------------------------|
| C/PAR | Corrective/Preventive Action Requests |
| DCG | Document Control Group |
| EMP | Environmental Management Program |
| EMR | Environmental Management Representative |
| EMS | Environmental Management System |
| EMT | Environmental Management Team |
| EPI | Environmental Performance Indicator |
| ESD | Environmental Services Department |
| RDD | Refuse Disposal Division |
| SEOP | Standard Environmental Operating Procedures |
| SOP | Standard Operating Procedure |

CHAPTER ONE

GENERAL REQUIREMENTS (4.1)

This Environmental Management System Manual (EMS-Manual) defines the methods that the Refuse Disposal Division (RDD) of the City of San Diego's Environmental Services Department (ESD) will use to plan, implement, assess, and continually improve its environmental management practices. This EMS-Manual is designed to meet the requirements of the ISO 14001 (*Environmental Management System -1996*) international standard; referred to hereafter as ISO 14001. It is supported by several lower-tier documents including Standard Environmental Operating Procedures (SEOPs), Standard Operating Procedures (SOPs), work instructions and records. Taken collectively, these documents and information systems are intended to provide a level of control and detail commensurate with the technical scope, environmental aspects, and regulatory compliance requirements applicable to RDD operations, as well as with the Division's personnel, technical resources, and practical management needs. The boundaries of RDD's EMS are depicted in the fence-line diagram (figure 1) as an aid to interested parties.

The EMS Manual reflects RDD's commitment to the achievement and maintenance of regulatory compliance, the prevention of pollution, and the continual improvement of its environmental management practices. This commitment is a fundamental component of the Division's environmental policy. The EMS Manual also describes the means for measuring environmental performance in relation to the environmental objectives and targets so established. As shown in Figure 1-1, it embodies a continual improvement process, based on the ISO-14001 standard, which is designed to systematically reduce environmental costs and liabilities while enhancing overall organizational and environmental performance.

Each EMS-Manual program element is summarized as follows:

Policy - the environmental policy statement (Chapter 2) establishes an overall framework for the development of appropriate environmental objectives and targets in balance with its public responsibilities and other management objectives.

Planning - environmental objectives and targets are established, based primarily upon an evaluation of current regulatory requirements and associated significant environmental aspects; see Chapter 3, Sections 4.3.1, 4.3.2, and 4.3.3.

Operational Control - appropriate controls for facilitating the achievement of the RDD's environmental objectives and targets are established through our Environmental Management Program, SEOPs, and other support systems, as noted in Chapter 4, Section 4.4.6.

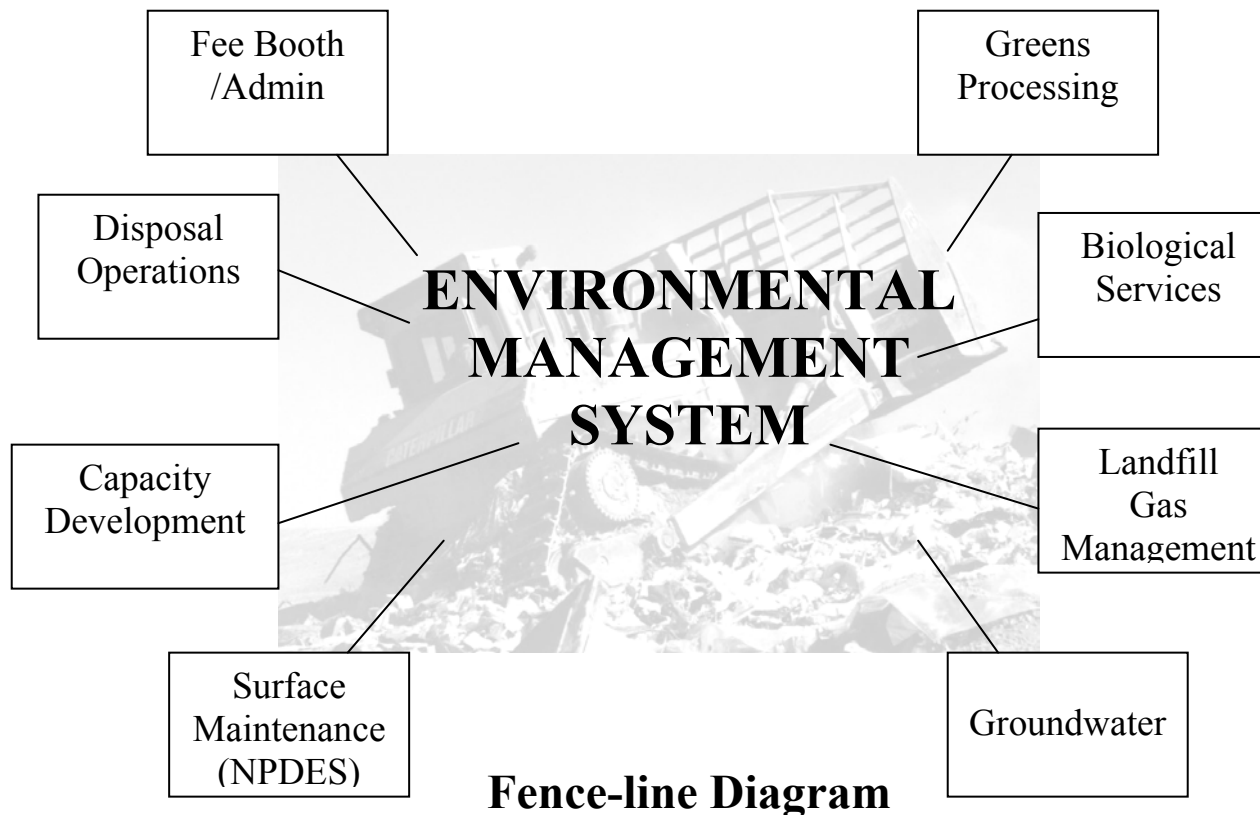
Monitoring and Measurement - the level of environmental performance which is required to maintain regulatory compliance and to achieve RDD's other environmental objectives and targets is monitored using the methods described in Chapter 5, Section 4.5.1. In some cases, monitoring information may prompt immediate process adjustments or preventive action.

Preventive and Corrective Action- If a non-conforming situation is suspected as a result of monitoring, measurement data review, compliance verification, or EMS audits, then the corrective and preventive action process described in Chapter 5, Section 4.5.2 will be initiated.

Management Review - the entire environmental management program is subject to periodic management review as described in Chapter 6



REFUSE DISPOSAL DIVISION



(Figure I)

ISO 14001 CONTINUOUS IMPROVEMENT PROCESS

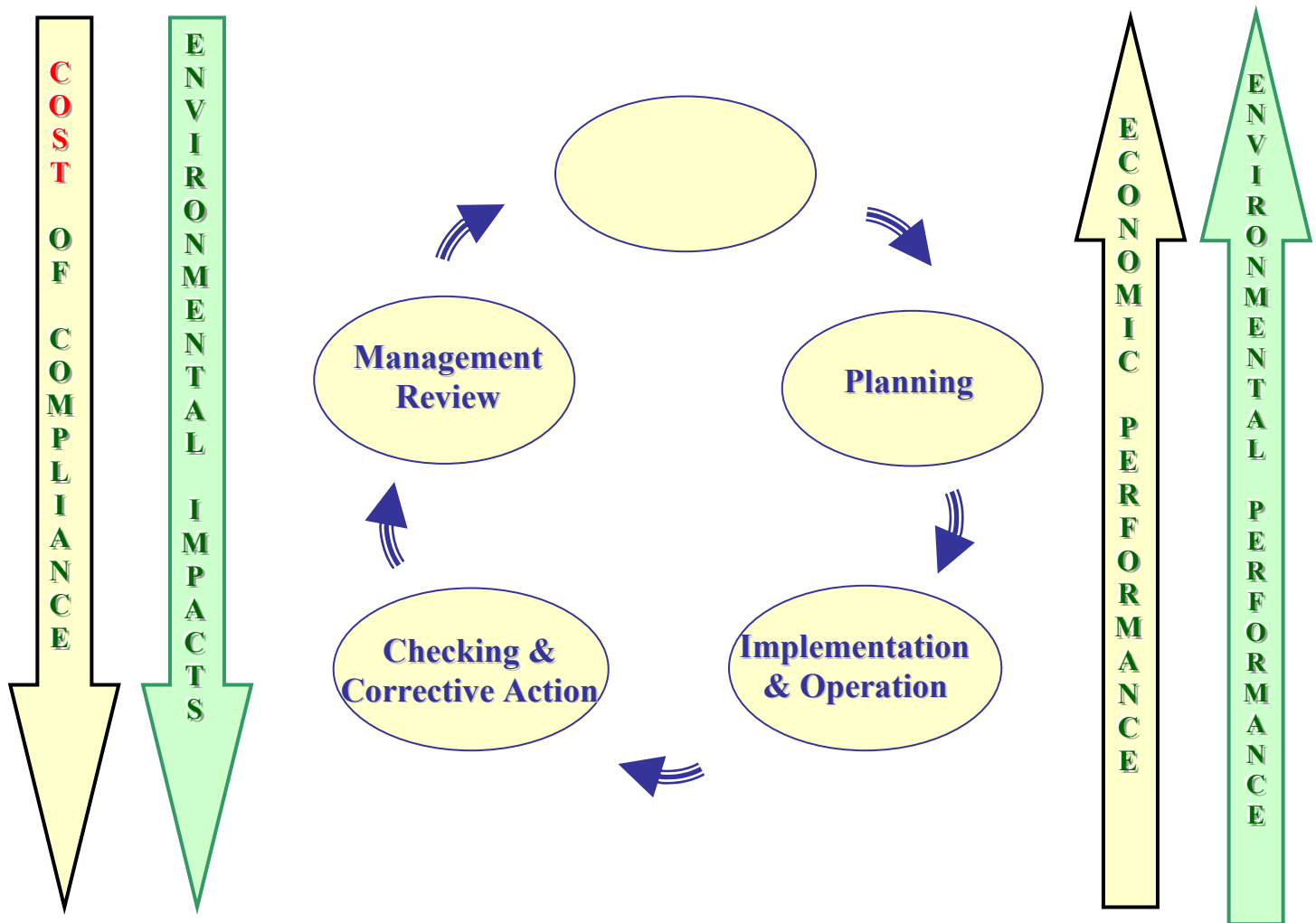


Figure 2

CHAPTER 2

ENVIRONMENTAL POLICY (4.2)

Refuse Disposal Division management defines the environmental policy, which is appropriate to the nature, scale and environmental impacts of its activities, products, and services. The environmental policy includes a commitment to continual improvement and to the prevention of pollution. The environmental policy also includes a commitment to comply with applicable environmental regulations and sets the framework for the setting of, and reviewing of, environmental objectives and targets. The environmental policy, which is endorsed by the Environmental Services Director, Assistant Director, Refuse Disposal Deputy Director, and the EMS Project Manager/Environmental Management Representative, is provided below.

ENVIRONMENTAL POLICY REFUSE DISPOSAL DIVISION

The Refuse Disposal Division of the City of San Diego's Environmental Services Department is entrusted with providing high quality solid waste disposal services for the citizens of San Diego and the greater San Diego metropolitan area. We are dedicated to carrying out this responsibility in a manner that demonstrates true leadership in environmental management while continuing to provide the highest level of service. By implementing and maintaining an Environmental Management System we are committed to an ongoing effort of promoting environmental responsibility as an organization as well as emphasizing a heightened environmental awareness to all interested parties and stakeholders.

We will demonstrate our commitment to this policy through:

- Regulatory Compliance – We will meet or exceed all applicable regulatory requirements,
- Prevention of Pollution – We will identify and prevent or minimize pollution in all areas attributed to our operations, wherever feasible, and
- Continual Improvement – We will continue to seek out ways to improve our environmental performance using this policy as the basis upon which we set our objectives and targets.

This policy will be conveyed to all Refuse Disposal Division staff, our consultants and contractors and made available to regulatory agencies, the public, or other interested parties upon request.

Note: This Policy has been signed by the Department's senior management and is posted throughout the Division as well as on our EMS website.

CHAPTER 3

PLANNING (4.3)

4.3.1 Environmental Aspects

Environmental aspects are elements of the Division's activities, products, and services, over which the Division has direct control and can be reasonably expected to influence and may have a positive and/or negative impact on the environment.

Environmental Aspects are:

- reviewed individually for each major section and for the RDD as a whole,
- significance determinations are made in relation to routine or emergency conditions, and
- documented in a manner which facilitates the establishment of appropriate environmental objectives and targets for each major section and/or the Division.

The evaluation of the significance of the environmental impacts associated with the identified environmental aspects is based on the judgment of the RDD Environmental Management Team (EMT), in conjunction with the significant aspects criteria guidelines. See figure 3-1.

Related Documentation

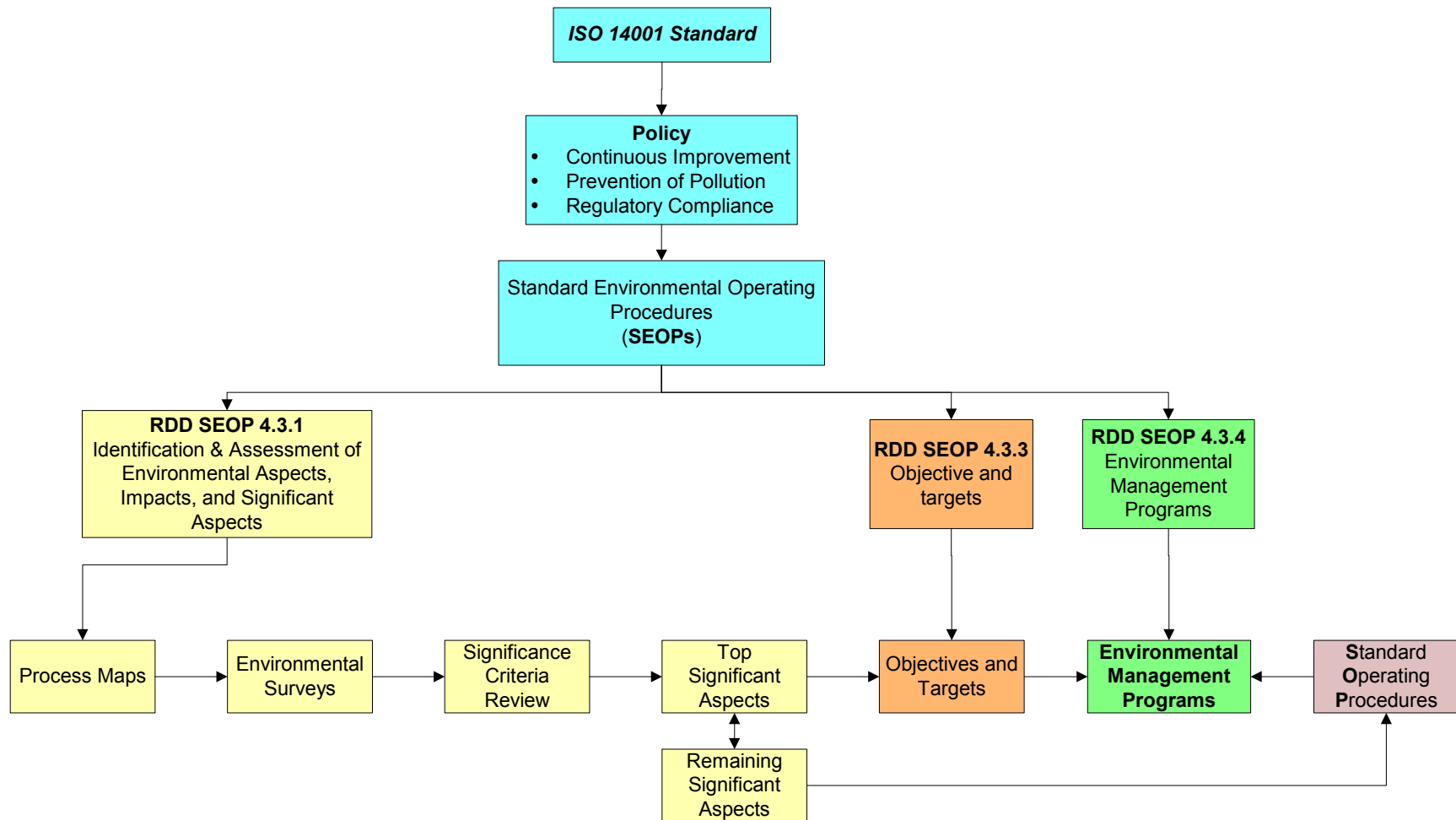
- RDD SEOP 4.3.1 "Identification and Assessment of Environmental Aspects, Impacts, and Significant Aspects"
- RDD SEOP 4.3.3 "Establishment of Environmental Objectives and Targets"

4.3.2 Legal and Other Requirements

Legal and other requirements, applicable to the Division's activities, products and services, are identified and routinely monitored by the City Attorney's Office, Department Director, RDD Deputy Director and RDD Section Managers. Such requirements are documented in site-specific operating permit inspection checklists prepared by Regulatory Agencies as well as section-specific documents prepared by the Section Managers or their designated representatives. Each Section Manager will provide a list of their regulatory requirements to the EMR.

The Section Managers maintain access to copies of relevant legislation through contacts with a variety of sources such as appropriate regulatory agency representatives, libraries, information services, internet and intranet web sites, and/or the City Attorney's office.

The Refuse Disposal Division has established and incorporates environmental management standards beyond compliance. These voluntary standards are also considered and applied to legal or regulatory requirements under this section of the EMS Manual.



Significant Aspects Management

Figure 3-1

Related Documentation

RDD SEOP 4.3.2 “Legal and Other Requirements”

RDD SEOP 4.5.1.2 “Regulatory Compliance”

4.3.3 Objectives and Targets

On at least an annual basis, the EMR shall (with the assistance and participation of the Deputy Director, Section Managers, and other RDD staff) establish, prioritize, and document appropriate annual environmental objectives and targets. When establishing and reviewing environmental objectives and targets, the Division considers:

- legal and other requirements,
- significant environmental aspects,
- technological and financial options,
- operational and business requirements and
- the views of interested parties.

The Division sets environmental objectives and targets which:

- support the environmental policy,
- address and/or mitigate its significant environmental aspects,
- are defined by appropriate management levels,
- are realistic, attainable and measurable and
- serve to improve environmental performance.

Environmental objectives and targets shall be set sufficiently in advance of the preparation of Division-wide budgets to permit their submittal to the RDD Deputy Director and ESD Senior Management for funding consideration. The current section-specific permit conditions described in Section 4.3.2 and the current significant aspects criteria prepared in compliance with Section 4.3.1 shall be considered in the process of selecting and prioritizing objectives and targets. Environmental objectives will be established at the Division level and associated targets at the Section level where deemed most appropriate.

Related Documentation

RDD SEOP 4.3.3 “Objectives and Targets”

RDD SEOP 4.3.4 “Environmental Management Programs”

4.3.4 Environmental Management Programs

The Division establishes and maintains an Environmental Management Program (EMP) for achieving its annual environmental objectives and targets. The EMP includes:

- designation of responsibility for achieving objectives and targets in each section (as appropriate),
- methods and timeframe for achievement and
- allocation of resources (both human and financial) required to achieve the objectives and targets within the specified amount of time.

The Environmental Management Representative (EMR) provides guidance and assistance to each section (as appropriate) in creating and reviewing targets associated with meeting the EMP's annual objectives.

The EMP is amended and updated (as necessary) to reflect:

- new developments,
- new or modified activities, products or services,
- changing business circumstances and/or requirements, and
- best available technological options.

Related Documentation

RDD SEOP 4.3.3 "Objectives and Targets"

RDD SEOP 4.3.4 "Environmental Management Programs"

CHAPTER 4

IMPLEMENTATION AND OPERATION (4.4)

4.4.1 Structure and Responsibility

Figure 4-1 depicts the general operational and administrative structure of the Refuse Disposal Division. Figure 4-2 identifies the EMS responsibilities within the organization.

The RDD Deputy Director is also responsible to the Environmental Services Department Director for ensuring the fulfillment of the Division's environmental policy goals and achievement of environmental objectives and targets. The Deputy Director approves the environmental policy and also participates in periodic environmental management reviews as described in Chapter 6.

The Environmental Management Representative (EMR) is responsible for managing the day-to-day implementation of the Division's EMS and shall coordinate with the Environmental Management Team members or Section Managers as necessary to support section-specific implementation. The EMR is also responsible for the internal audit program and all activities involving third-party registration and maintenance of RDD's EMS to the ISO 14001 standard.

Section Managers are ultimately accountable for the implementation and performance of the EMS within their sections. Section Managers play a direct role in establishing and approving environmental targets, reviewing the performance of the EMP and providing sufficient resources (human, financial and technical) to their section's EMS goals.

The Environmental Management Team is responsible for developing and refining the EMS program within the Division, communicating changes to their respective sections and providing training to Division employees as required. The Environmental Management Team is responsible for ensuring that the RDD's EMS remains suitable, adequate and effective, in relation to the Division's environmental aspects, its operational mission and its underlying policy commitments to continual improvement, the prevention of pollution and regulatory compliance.

The Internal Audit Team is responsible for conducting periodic audits of the RDD's EMS. All Audit Team members will be trained either through an approved third-party trainer or trained RDD Lead Auditor before participating on the Audit team.

RDD employees have the responsibility to carry out their job assignments following approved procedures to facilitate effective environmental management. For each level and function that has established environmental objectives and targets, the roles and responsibilities of the employee shall be defined and it shall be documented that the employee has received the appropriate training to accomplish the work assignment.

Related Documentation

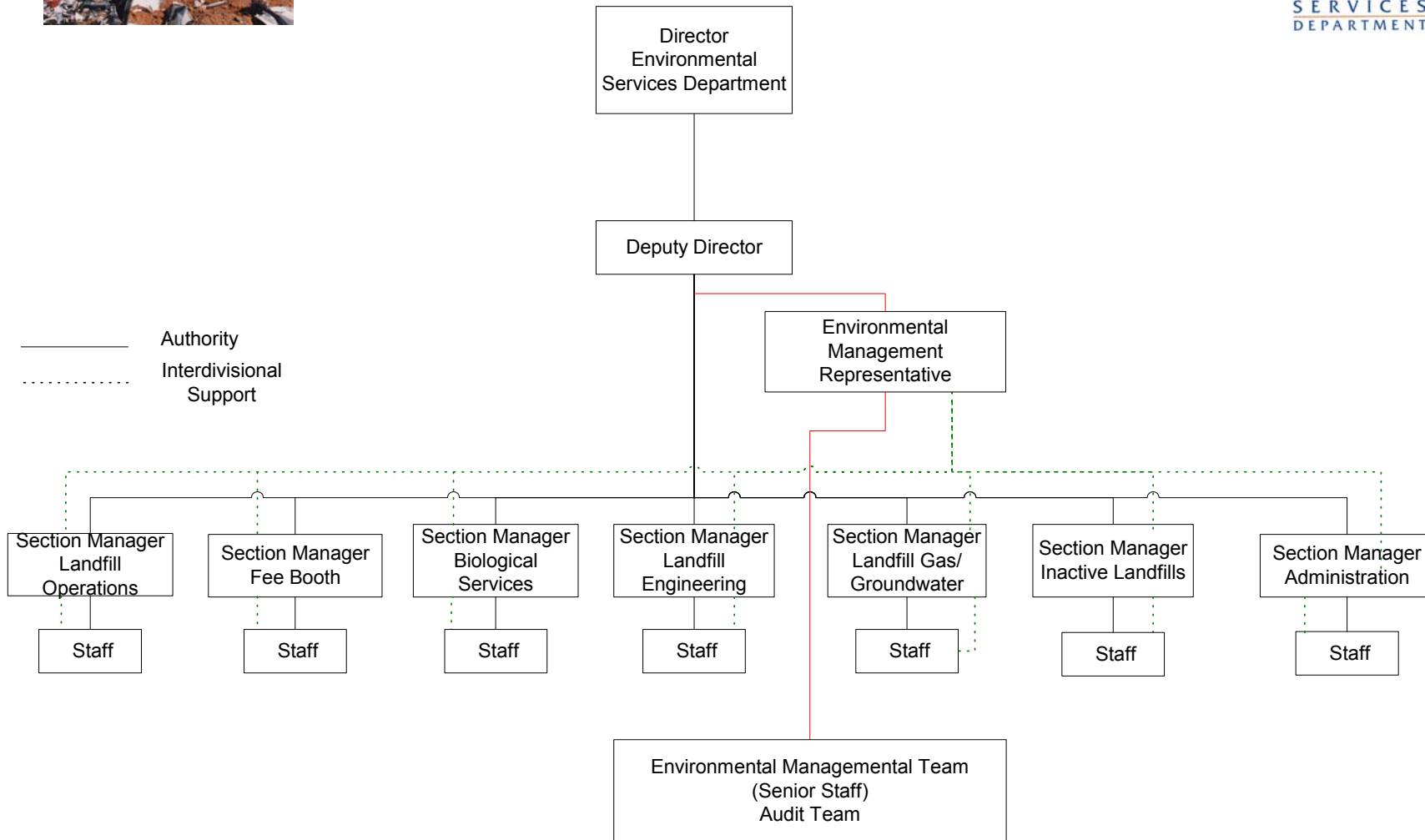
Miramar Landfill Operations Manual

4.4.2 Training, Awareness, and Competence

RDD personnel shall receive training of a type and level of detail that is appropriate for the environmental aspects of their routine and emergency work assignments, in compliance with the requirements of RDD SEOP 4.4.2, "Training." RDD staff shall receive refresher training on at least an annual basis in order to maintain their general awareness of the issues addressed in this EMS-Manual.



**ENVIRONMENTAL SERVICES DEPARTMENT
REFUSE DISPOSAL DIVISION
ENVIRONMENTAL MANAGEMENT SYSTEM
ORGANIZATION**



Field Operations includes Greens Recycling and Disposal Operations
Landfill Engineering includes Capacity Development and NPDES for the active landfill

Figure 4-1

RESPONSIBILITY MATRIX

| | | Deputy Director | EMR | Office Mgr | Eng Support Manager | Fee Booth Manager | Biological Svcs Manager | Landfill Eng Manager | Field Ops Manager | Employees | EMT |
|----|----------------------------------------------------|--------------------|-----|---------------|------------------------|----------------------|----------------------------|-------------------------|----------------------|-----------|-----|
| 1 | Coordinate EMS Doc Control | - | L | S | S | S | S | S | S | - | - |
| 2 | Communicate importance of environmental management | L | L | S | S | S | S | S | S | L | S |
| 3 | Track/Analyze new regulations | L | S | - | L | L | L | L | L | S | S |
| 4 | Prepare Regulatory Reports | L | - | - | L | L | L | L | L | S | - |
| 5 | Coordinate Communication with interested parties | L | L | S | S | S | S | S | S | S | S |
| 6 | Obtain Permits and develop compliance plans | L | - | S | L | L | L | L | L | S | - |
| 7 | Coordinate Auditing effort | S | L | S | S | S | S | S | S | S | S |
| 8 | Train employees on EMS | S | L | S | S | S | S | S | S | - | S |
| 9 | Communicate with contractors EMS expectations | L | S | L | L | L | L | L | L | S | S |
| 10 | Comply with applicable regulatory requirements | L | S | S | L | L | L | L | L | S | S |
| 11 | Conform with RDD EMS requirements | L | L | S | S | S | S | S | S | S | L |
| 12 | Coordinate Emergency response | L | - | S | S | S | S | L | S | S | - |
| 13 | Establish EMS Objectives | L | L | S | S | S | S | S | S | S | S |
| 14 | Establish EMS Targets | S | S | L | L | L | L | L | L | S | S |
| 15 | Develop EMS budget | L | S | L | L | L | L | L | L | - | S |
| 16 | Monitor key processes | S | S | L | L | L | L | L | L | S | S |
| 17 | Maintain EMS records | S | L | S | S | S | S | S | S | S | - |

L = Lead Roll
 S = Support Roll
 - = Not Applicable

Figure 4-2

All employees and contractors whose work or activities and services at RDD sites could create a significant environmental impact are required to have appropriate EMS awareness training. The purpose of the training is:

- to ensure the employee/contractor understands the importance of conformance with the environmental policy and procedures and with the requirements of the EMS,
- to ensure that the employee/contractor is aware of the significant environmental impacts, actual or potential, of their work activities and the benefits of improved environmental performance,
- to ensure that the employee/contractor understands the potential consequences of departure from operating procedures specified within the EMS, and
- to ensure that the employee/contractor understands their roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the EMS.

Training activities shall be documented and maintained as environmental records in compliance with Chapter 5, Section 4.5.3.

Related Documentation

RDD SEOP 4.4.2 “Training”
RDD SEOP 4.5.3 “Records”

4.4.3 Communication

The RDD uses a number of mechanisms to ensure effective communication with interested parties. These mechanisms include regulatory filings (such as permits, applications and reports), informational meetings and briefings, the EMS website, press releases, public meetings, landfill tours and conferences. The RDD solicits views of interested parties on its EMS; its environmental performance and other related matters.

The requirements of RDD's EMS, environmental policy, and its supporting plans, procedures and information systems shall be communicated to RDD staff either through the training processes described in Section 4.4.2 of this Chapter or by controlled document distribution, as described in Section 4.4.5. The Deputy Director may initiate external communications or meetings regarding RDD's EMS with private citizens, environmental groups, regulatory agencies, or other external stakeholders.

In addition, incoming verbal or written inquiries received by any RDD employee that are related to the Division's environmental policies or performance shall be referred to the EMR via the Section Manager for logging, evaluation and appropriate action.

Related Documentation

RDD SEOP 4.4.3 "Communication"

4.4.4 EMS Documentation

The RDD EMS is documented at four general levels of detail, as shown in figure 4-4. Each level is described as follows:

Level 1 - consists of this EMS-Manual; note that the Division's environmental policy is incorporated as Chapter 2.

Level 2 - consists of supporting regulation-based planning documents, SEOPs and other supporting plans, documents, and/or information systems that may be required to fully implement the requirements of the ISO 14001 standard.

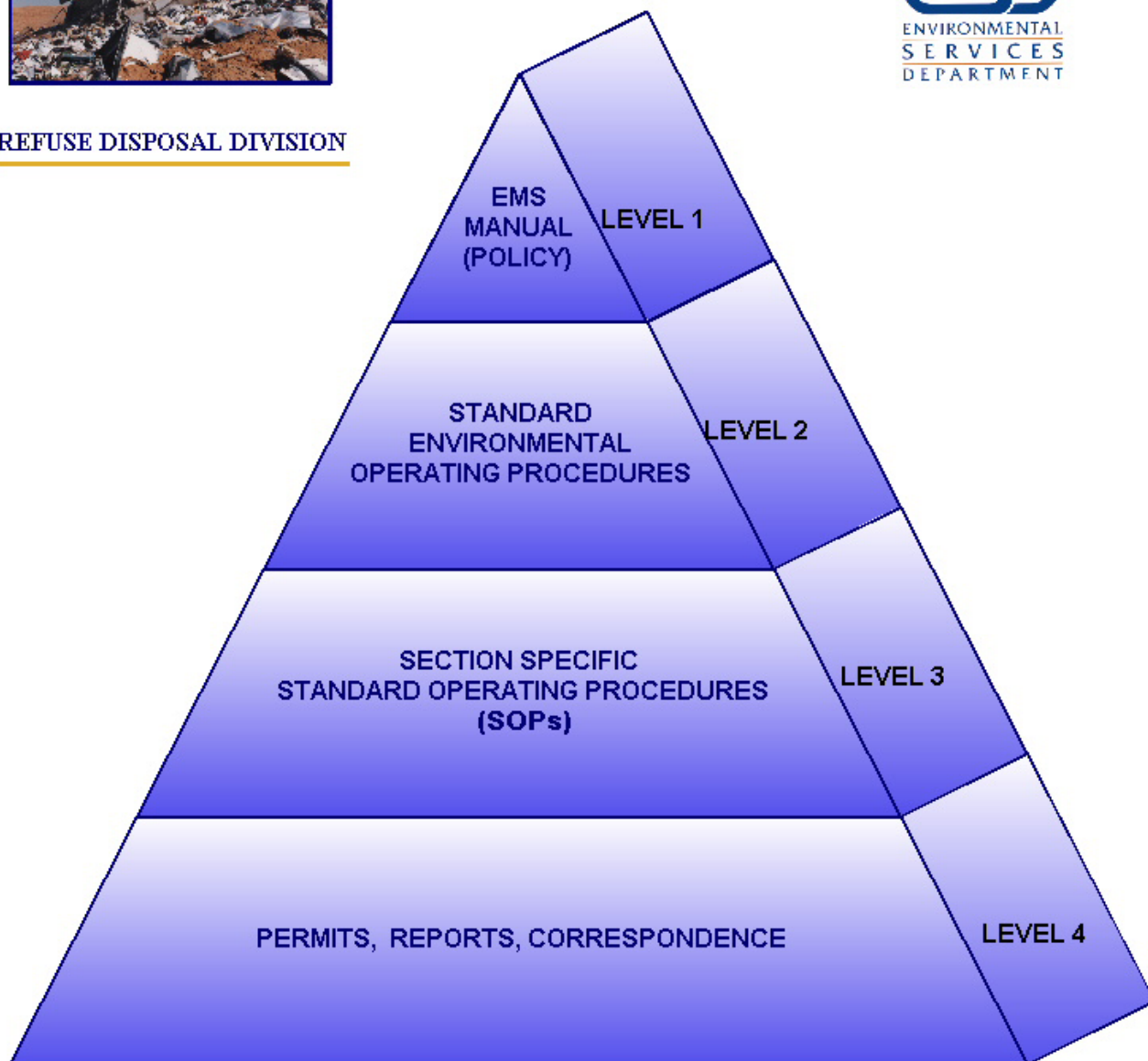
Level 3 - consists of section-specific work instructions and standard operating procedures which identify approaches to managing task-oriented activities that relate to environmental impacts.

Level 4 - consists of records and forms relating to Level 2 and 3 documentation, internal staff memos, corrective/preventive action requests (C/PARs), reference lists or documents, reports, and other supporting documents developed in compliance with regulatory requirements or other EMS requirements.

The following Document Control Matrix is a quick cross-reference aid for locating EMS supporting documentation throughout the Refuse Disposal Division's EMS.



REFUSE DISPOSAL DIVISION



EMS DOCUMENT HIERARCHY

EMS - Environmental Management System

Figure 4-3

EMS - Documentation Matrix

**RDD Core Elements are available in hard copy through the EMR and in electronic format via the division's intranet website (citynet.sannet.org) under Environmental Management System (EMS).*

| ISO 14001 Standard | RDD Core Elements | | | |
|----------------------------------------------------|-------------------|----------------|-------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| | EMS Manual | SEOP's | Ops Manual/ SOP's | Other |
| 4.2 Environmental Policy | Chapter 2 | | | <ul style="list-style-type: none"> • ESD/RDD EMS Internet Website: Policy • Posted on-site |
| 4.3 Planning | Chapter 3 | RDD-SEOP 4.3 | | |
| 4.3.1 Environmental Aspects | Ch.3, p.5 | RDD-SEOP 4.3.1 | | <ul style="list-style-type: none"> • Process Maps • EMS Internet Website: EMP's/Significance |
| 4.3.2 Legal and other requirements | Ch.3, pp.5-7 | RDD-SEOP 4.3.2 | Miramar Landfill Operations Manual: Part A, section V | EMS Internet Website: Links/Regulatory |
| 4.3.3 Objectives and Targets | Ch.3, p.7 | RDD-SEOP 4.3.3 | | <ul style="list-style-type: none"> • EMP Master Document • EMS Internet Website: EMP's/Significance |
| 4.3.4 Environmental Management Programme(s) | Ch.3, p.8 | RDD-SEOP 4.3.4 | | <ul style="list-style-type: none"> • EMP Master Documents • EMS Intranet Website: EMP's |
| 4.4 Implementation and Operation | Chapter 4 | | | |

EMS - Documentation Matrix (continued)

| ISO 14001 Standard | RDD Core Elements | | | |
|---------------------------------------------------------------|-------------------|----------------|--------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| | EMS Manual | SEOP's | Ops Manual/ SOP's | Other |
| 4.4.1 Structure and Responsibility | Ch.4, pp.8-9 | | Miramar Landfill Operations Manual: Part A, section I | 4.4.1 Structure and Responsibility |
| 4.4.2 Training, Awareness and Competence | Ch.4, pp.9-12 | RDD-SEOP 4.4.2 | Miramar Landfill Operations Manual: Part B, SOP's | |
| 4.4.3 Communication | Ch.4, pp.12-13 | RDD-SEOP 4.4.3 | Miramar Landfill Operations Manual: Part B, section I-C, D | Communications Log (hard copy only) |
| 4.4.4 Environmental Management System documentation | Ch.4, pp.13-15 | | Miramar Landfill Operations Manual: Part B, SOP's | <ul style="list-style-type: none"> ● Document Matrix ● RDD EMS Master Forms and Documents List |
| 4.4.5 Document Control | Ch.4, pp.15-16 | RDD-SEOP 4.4.5 | | |
| 4.4.6 Operational Control | Ch.4, p.16 | RDD-SEOP 4.4.6 | Miramar Landfill Operations Manual: Part A, sections II & III, Part B, sections VI-X | |
| 4.4.7 Emergency Preparedness and Response | Ch.4, pp.16-17 | RDD-SEOP 4.4.7 | Miramar Landfill Operations Manual: Part B, section XII | Miramar Landfill Business Plan |
| 4.5 Checking and Corrective Action | Chapter 5 | | | |

EMS - Documentation Matrix (continued)

| ISO 14001 Standard | RDD Core Elements | | | |
|-----------------------------------------------------------------------------|-------------------|-----------------------------------------------------------------|----------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| | EMS Manual | SEOP's | Ops Manual/ SOP's | Other |
| 4.5.1 Monitoring and Measurement | Ch.5, pp.17-18 | RDD-SEOP 4.5.1 RDD-SEOP 4.5.1.1 RDD-SEOP 4.5.1.2 | Miramar Landfill Operations Manual: Part B, sections X & XI | |
| 4.5.2 Nonconformance and Corrective and Preventative Action | Ch.5, pp.18-19 | RDD-SEOP 4.5.2 | Miramar Landfill Operations Manual: Part B, SOP's | |
| 4.5.3 Records | Ch.5, p.19 | RDD-SEOP 4.5.3 | | EMS Internet Website: Document Control/Records Reference List |
| 4.5.4 Environmental Management System Audit | Ch.5, p.20 | RDD-SEOP 4.5.4 | | <ul style="list-style-type: none"> ● Audit Reports ● EMS Internet Website: Reports |
| 4.6 Management Review | Chapter 6 | RDD-SEOP 4.6.0 | | <ul style="list-style-type: none"> ● Management Review Reports ● EMS Internet Website: Reports |

Related Documentation

RDD EMS Master Forms and Documents List

4.4.5 Document Control

The Document Control System established for the Environmental Services Department, Refuse Disposal Division is designed to control the approval, issuance, and distribution of new and revised Environmental Management System (EMS) documents and forms as well as to control the removal of obsolete documents and forms.

City of San Diego
Environmental Services Department
Refuse Disposal Division

Environmental Management Plan
EMS – Manual, Rev 2
Effective Date: 03/12/03

The Document Control Group (DCG), with assistance from the EMR, RDD Deputy Director and Section Managers, is responsible for assuring that all EMS documents are reviewed, approved, issued, distributed (where applicable), and revised according to the RDD document control system.

The DCG maintains the master files for EMS documentation as well as a master list of all current EMS documentation and a history of changes to the documentation. They are also responsible for specifying and verifying the requirements for electronic data control.

Controlled documents are identified with a unique document number provided by the Document Control Group (DCG). The original master (signed copy) documents are maintained by the EMR. Other controlled copies are distributed as necessary and are tracked on the Document Distribution List.

Controlled hard copies of EMS documents (except forms) are stamped “CONTROLLED COPY” in red ink. Any photocopies of these will be gray or black, which will identify them as “UNCONTROLLED” copies. Uncontrolled copies of EMS documents may be issued to persons who are not part of the EMS or used for reference by division personnel.

The EMS-Manual, RDD-SEOP’s, SOP’s and forms are available electronically on the Division’s EMS website. These documents are accessible in a “PDF” format maintaining the integrity of the document.

Related Documentation

RDD SEOP 4.4.5 “Document Control”
RDD SOPs and Work Instructions Reference List
RDD EMS Master Forms and Documents List

4.4.6 Operational Control

It is the responsibility of the Environmental Management Representative and RDD Section Managers to prepare appropriate procedures for those situations where the absence of a procedure could lead to deviations from the Environmental Policy and the Division’s objectives and targets.

Section Managers are responsible for developing and/or approving section-specific Standard Operating Procedures (SOPs) where the absence of SOPs could lead to a significant environmental impact.

Procedures are reviewed and revised based upon corrective actions recommended as the result of environmental incidents (such as spills or releases) or environmental audits, when new processes or products are introduced and when new environmental regulations are identified that could reasonably affect the Division's operations.

New or revised SEOPs and SOPs are to be processed by the Document Control Group (DCG) per RDD SEOP 4.4.5.

Related Documentation

RDD-SEOP 4.4.6 "Operational Control"

4.4.7 Emergency Preparedness and Response

Emergency preparedness and response is addressed in the current issue of the Miramar Landfill Operations Manual. In the case of hazardous materials, they are addressed by the San Diego County Department of Environmental Health site specific Hazardous Materials Business Plan. The Miramar Landfill Operations Manual contains emergency response procedures for use at the operations level for specifically responding to emergency events.

RDD will conduct, and document an annual test of its emergency response procedures, where practicable. The practicality of conducting a test will be evaluated and documented to ensure all identified emergencies are considered. Results of tests or actual emergency responses will be used to evaluate the effectiveness of the procedures and satisfy the requirement of SEOP 4.4.7 "Emergency Preparedness and Response".

Related Documentation

Miramar Landfill Business Plan

Miramar Landfill Operations Manual

RDD SEOP 4.4.7 "Emergency Preparedness and Response"

CHAPTER 5

CHECKING AND CORRECTIVE ACTION (4.5)

4.5.1 Monitoring and Measurement

The RDD maintains procedures to regularly monitor and measure the key characteristics of its activities, products and services which could have a significant impact on the environment. These procedures include the recording of information to track:

- performance,
- relevant operational controls,
- conformance with RDD's environmental policy, and
- progress in achieving environmental objectives and targets.

Environmental monitoring equipment calibration is completed by RDD staff prior to use and/or periodically per the manufacturer's instruction. In addition, monitoring equipment will be sent to the manufacturer for re-calibration whenever RDD staff calibration results fall outside the manufacturer's guidelines. Calibration and maintenance records are retained according to Section 4.5.3 of this manual.

Related Documentation

RDD SEOP 4.5.1 "Monitoring and Measurement"

RDD SEOP 4.5.1.1 "Equipment Calibration"

4.5.1.1 Environmental Performance Indicators and Performance Monitoring

Section Managers shall initiate the actions necessary to provide performance data or other reports that may be required as an operating permit or other regulatory condition and for meeting the annual objectives and targets of RDD's EMS. Performance monitoring data and report correspondence shall be retained as environmental records and used to support the EMS Management Review, as required by Section 5.3 of this chapter and in chapter six of this manual. Specific environmental performance indicators may be developed to facilitate the measurement of progress made in achieving environmental objectives and targets, as noted in RDD SEOP 4.3.3, "Environmental Objectives and Targets."

4.5.1.2 Regulatory Compliance

The EMR shall coordinate with the Division Analyst to verify RDD compliance with applicable federal, state, and local environmental regulatory requirements on a quarterly basis. This regulatory compliance audit shall be performed by, or at the direction of, the EMR in compliance with the requirements of RDD SEOP 4.5.1, "Monitoring and Measurement." The actual results from the appropriate site-specific operating permit inspections shall be used as a benchmark for the audit. Items identified as part of the regulatory compliance audit that suggest a specific lack of compliance shall be documented and resolved as required by RDD SEOP 4.5.2, "Corrective and Preventive Action." The scope of the audit shall specifically exclude issues related to compliance with the ISO 14001 standard, which are separately addressed through the EMS audit processes described in Section 5.3 of this chapter and through independent registration and surveillance audits conducted by an approved ISO 14001 registrar.

4.5.2 Control of Nonconformance and “Corrective and Preventive” Action

All RDD employees are responsible for bringing suspected environmental non-conformances to the attention of their supervisor, Section Manager and/or the EMR for evaluation and initiation of appropriate corrective and preventive action. Environmental non-conformances are defined as conditions that have or could result in unanticipated environmental impacts; that are contrary to the RDD’s environmental policy or which represent a lack of compliance with the provisions of this EMS or its supporting plans and procedures. If, in the judgment of a Section Manager, the EMR, an Internal Auditor or Third Party Auditor, a non-conformance exists, a Corrective/Preventive Action Request (C/PAR) or Corrective Action Request (CAR) shall be initiated and tracked until resolution and closure in compliance with the requirements of RDD SEOP 4.5.2, “Corrective and Preventive Action.”

The procedure for investigating, correcting and preventing non-conformance includes the following elements:

- identifying the root cause of the non-conformance,
- identifying and implementing the necessary corrective action,
- implementing new or modifying existing controls to prevent a recurrence of the non-conformance, and
- recording any changes to documented procedures resulting from the corrective and preventive actions.

Completed C/PARs shall be retained as environmental records in compliance with Section 5.3 of this Chapter. RDD SEOP 4.5.2 “Corrective and Preventive Action” requirements shall apply uniformly to the resolution of non-conformances that may be observed as part of compliance verification activities, routine monitoring tasks, external notifications or complaints, or from internal or external (third-party) EMS audits.

Related Documentation

RDD SEOP 4.5.2 “Corrective and Preventive Action”

4.5.3 Records

Environmental records shall be identified and routed to the EMR or his designee for filing and storage in the RDD Environmental Records Management System. Environmental records are defined as legible, completed documents which provide objective evidence of the completion of environmental management actions, or of any other actions required to implement RDD’s EMS and its supporting plans, procedures, C/PARs, or other implementing documents. At a minimum, environmental records shall be retained for a period of three years or longer if required by regulatory agencies, The City of San Diego, or RDD guidelines. Records will

contain the necessary level of organization and detail to permit ready access to all required record categories. Certain categories of section-specific records may be stored offsite, provided that access is controlled through the Section Manager, that appropriate system cross references are maintained and that storage areas and filing methods are functionally equivalent to those provided at Ridgehaven Court.

Related Documentation

RDD SEOP 4.5.1 “Document Control”

RDD SEOP 4.5.3 “Records”

4.5.4 Internal Audits

The RDD maintains a procedure for the conduct of internal EMS audits. The purpose of these audits is to determine whether the EMS:

- conforms to planned arrangements for environmental management including the requirements of the ISO 14001 Standard, and
- has been properly implemented and maintained

The internal EMS audit procedure addresses the following:

- activities and areas to be audited (audit scope). Based upon the environmental importance of the activity concerned, and upon the results of prior internal audits,
- audit frequency,
- audit methodology,
- responsibilities associated with managing and conducting audits,
- communication (reporting) of the audit results, and
- auditor qualifications.

Results of internal EMS audits are reported to the RDD Deputy Director, EMR and Environmental Management Team, and to other top RDD staff, as appropriate. Timely responses for corrective actions to be taken on any non-compliance are required. Corrective actions are verified during subsequent follow-up internal audits and managed through the corrective and preventive action procedure (see Section 5.2 of this chapter). All audit records are considered CONFIDENTIAL and are maintained in accordance with the RDD SEOP 4.5.3 “Records”.

Related Documentation

RDD SEOP 4.5.4 “Internal Audits”

RDD SEOP 4.5.3 “Records”

CHAPTER 6

MANAGEMENT REVIEW (4.6)

A comprehensive internal management review of the Division's EMS shall be performed at least annually to ensure its continuing suitability, adequacy and effectiveness, and to assure the RDD's commitment to continual improvement. This review is conducted by, or at the direction of, the RDD Deputy Director with the assistance of designated senior management staff and the EMR. The methodology for performing such reviews shall comply with the requirements of RDD SEOP 4.6.0, "Management Review." At a minimum, management reviews shall consider:

- annual Environmental Management Program (EMP) performance monitoring information,
- results of Corrective Action Requests (CARs) from internal EMS audits, third-party registration audits,
- results of Corrective/Preventive Action Requests from employee submissions,
- internal/external stakeholder issues, as indicated by review of the environmental communications log, and
- regulatory inspection results including: Notice of Violations, Areas of Concern, Notices to Comply, and fines.

The information so provided shall be evaluated against the requirements of RDD's Environmental Policy (see Chapter 2), along with any anticipated regulatory compliance requirement changes or new managerial or City Council directives which may affect the environmental aspects of RDD operations. The review shall be recorded and documented in report format and shall be presented to the RDD Deputy Director for review and comment. Specific action items requested from management reviews shall be documented by internal memoranda or C/PARs that address updates or modifications to the RDD EMS, or other appropriate improvement actions. Improvement actions that relate to non-conforming conditions shall be referred to the EMR for initiation of corrective/preventive action processes in compliance with RDD SEOP 4.5.2, "Corrective and Preventive Action".

Related Documentation

RDD SEOP 4.6.0 "Management Review"